Summaries of Direct Investigations

EDUCATION AND MANPOWER BUREAU (EMB)

Enforcement of Education Ordinance on Universal Basic Education

Background

In the wake of reports of children of school age (six to 15) being kept from school and local children of ethnic minorities not getting school places, The Ombudsman conducted a direct investigation into the mechanism of enforcing compulsory education.

Current Enforcement Mechanism

2. EMB requires heads of schools to report dropout cases urgently through the "Early Notification System" to its Student Guidance Section (SGS). Every means available to EMB with the involvement of counsellors, educational psychologists, family workers and school social workers will be deployed to persuade dropouts to resume school.

3. Difficult cases which remain unresolved after six months are referred to EMB's Internal Review Board (Review Board) for follow-up actions, e.g. issuing warning letters and statutory attendance orders.

4. For pre-school children, parents will be reminded through publicity programmes to send their children to school.

5. EMB has no record of any child of ethnic minorities not being placed in school. Those who claimed to have encountered difficulties in securing places may have been trying to transfer to their preferred schools. EMB has asked schools to refer excess applications received to them for follow-up action. EMB will strengthen collaboration with non-governmental organisations serving ethnic minorities.

Observations and Opinions

6. This Office accepts that absenteeism of pre-school children is insignificant according to enrolment statistics. Reminding parents of their legal obligation to send their children to school through publicity programmes is appropriate and adequate.

7. We welcome EMB's assurance that there are sufficient school places for children of ethnic minorities. However, more publicity is needed for promoting awareness of Government's offer of assistance in school placement.

8. We note EMB's reservations over the issue of warnings and orders in dropout cases. However, the legislation has been introduced to safeguard children's right to education and the law should be observed. Undue lenience puts such right at risk and the law in disrepute.

9. We note that schools did not always comply with EMB's guidelines in notifying SGS of dropout cases.

10. Counselling is at times clearly unlikely to be fruitful. Requiring SGS to continue with counselling for six months before referring the case to the Review Board simply delays enforcement. With EMB's apparent hesitation (or, in its view, cautiousness) towards stronger action, some cases have dragged on for years.

11. The Review Board takes months to issue a warning letter and is even more reluctant to issue attendance orders. In the four cases the Office has studied in the course of the investigation, the Department of Justice commented on two occasions that the time lapse between dropout and the recourse to legal action had been too long. Cautious planning is no excuse for dilatoriness.

12. It is common belief that compulsory education was prompted by exploitation of child labour. This problem no longer exists. These days, our community is more affluent, labour legislation more comprehensive and Government assistance to the needy and vulnerable much enhanced. We see the time as appropriate for Government to review the need for enforcing schooling by law and to go for an administrative policy of "free universal basic education".

Recommendations

13. The Ombudsman has made the following recommendations to the Permanent Secretary for Education and Manpower –

General

(a) Regularly review and repeat publicity programmes to promote awareness of the law on compulsory education and the benefits of schooling.

Children of ethnic minorities

(b) Inform ethnic minorities, through such channels as schools, relevant Non-Government Organisations (NGOs) and the media, of Government's offer of assistance in school placement.

(c) Strengthen collaboration with relevant NGOs to better understand the needs of the ethnic minorities in regard to education.

Dropouts

General

(d) Work out, as a general guide, a reasonable and realistic timeframe and flow chart for bringing students back to school –

i) by counselling; or
ii) by firmer legal measures.

Guidelines to schools

(e) Review the guidelines to schools for reporting dropouts to cut delay in follow-up action and institute early warning for non-compliance.

(f) Issue reminder to heads of schools to reiterate the importance of complying with the requirements of the "Early Notification System" in the interests of students concerned.

Counselling

(g) Where counselling is unlikely to work, refer to the Review Board without delay.

Warning and legal action

(h) Require the Review Board –

i) to be firm and decisive in issuing warning letters early; and
ii) on non-compliance with warning letters, to decide on timely service of attendance orders.

Statutory school attendance

(i) Review the need for enforcing compulsory education by law.

Comments from EMB

14. Recommendations (a) to (c) are being implemented. In connection with recommendations (d) to (h), EMB will re-engineer the existing procedures and practices to cut short the time taken for intervention and provision of support services for non-attendance cases.

15. On recommendation (i), having reaffirmed Government's position on the need to enforce compulsory education by law, EMB will not review the policy. The Ombudsman respects EMB's professional judgement and prerogative on how universal basic education should be enforced.

A Further Note

16. On Government's policy for integrating children of ethnic minorities into the local community, we are aware of considerable concern amongst these minorities over the children's difficulties in taking up the regular curriculum. There are some suggestions –

(a) that Chinese be taught as a second language; and

(b) that their own language be also taught.

In this light, there is a case for Government to review the curriculum for these children. We recognise that this is a matter of policy whether and how improvement should be made. Our observations here aim to generate discussion.

May 2003

Summaries of Direct Investigations

EFFICIENCY UNIT (EU)

Operation of Integrated Call Centre (ICC)

Background

ICC, managed by EU of the Chief Secretary for Administration's Office of the Government Secretariat, was set up to provide a one-stop telephone service for enquiries and complaints in July 2001. EU envisaged that ICC would benefit all parties – more convenience and better service to the public, operational and efficiency gains for client departments with increased productivity, improved management and a positive image for Government. We have been receiving complaints about ICC's handling of public enquiries and complaints since it began operation. This triggered our investigation into the quality of service and accuracy of information provided by ICC.

Operation and Concept of ICC

2. Over 60 hotlines formerly operated by 12 Government departments have been taken up by ICC progressively since July 2001. In November 2001, parallel to the 60 departmental hotlines, EU introduced the Citizen's Easy Link single-number hotline 1823, also catering for public enquiries and complaints.

3. The ICC concept involves use of both telephony and information technology. Through an Interactive Voice Recording System, incoming calls are directed to operators on the basis of language or specialty. Operators use a computerised system to look up information in a knowledge base to provide an immediate response to callers or to send messages to the appropriate department for follow-up action. The computer system also logs calls for monitoring and statistical analysis.

4. Under Service Level Agreements between EU and client departments, ICC is expected to meet certain performance measures such as an abandoned call rate of less than 10 percent, answering calls within 12 seconds and a first call resolution rate of 90 percent for enquiries.

5. To compare ICC with other operators, we visited call centres run by non-participating departments and by a private company.

Observations and Opinions

6. Our investigation confirmed that ICC had improved Government's public enquiry service and identified the following areas for further improvement –

Maintenance of the knowledge base

(a) Rigidity of data-entry templates delayed the updating of information, which resulted in misassignment or misdirection of calls.

Misassignment of cases, staff training and work allocation

(b) Call agents have to serve many departments and functions. This has led to errors of misassignment and misdirection of cases. ICC's performance level had dropped as the number of client departments increased.

Call centre identity, accountability and personal data privacy

(c) ICC answers calls in the name of client departments. This raises concern about transparency, accountability and personal data privacy. Some departments felt that their reputation might be affected by proxy if ICC mishandled their calls.

One-stop service

(d) Government intends to move to a single-number hotline for all enquiries and complaints. This has been partly achieved by integrating over 60 departmental hotlines into ICC but there is as yet no timetable for full migration.

Management culture and working relationship

(e) ICC's organisational culture is more task- than people-oriented. Some client departments considered that ICC dominated, rather than accommodated, their requirements. There was a case for review and realignment for more cordial and cooperative partnership between ICC and client departments.

Recommendations

7. The Ombudsman made 18 recommendations to EU –

Maintenance of knowledge base

(a) Greater concern should be given to the different requirements of individual client departments. The knowledge base should be updated promptly and kept current.

(b) Consideration should be given to linking the knowledge base to Government's Geographical Information System datamap.

Misassignment of cases to departmental staff

(c) Misdirection / misassignment errors should be systematically monitored and corrective measures incorporated into the knowledge base.

(d) ICC should monitor the progress of unresolved enquiries / complaints and remind client departments accordingly.

(e) EU should carry out annual reviews of the knowledge base at a more global level to update departmental policies and procedures not covered in day-to-day updating.

Staff training and work allocation

(f) There should be a team responsible for interdepartmental coordination. Teams should be set up to specialise in dealing with enquiries or complaints on particular subjects or departments.

(g) Client departments should brief ICC staff from time to time to enhance knowledge of their operations.

Call centre identity

(h) ICC should answer calls in its own name. Reference to hotline numbers in departmental telephone directories should indicate that calls are handled by ICC.

(i) There should be publicity to promote awareness of ICC and its relationship with client departments.

Accountability

(j) ICC should shed its anonymity, particularly if it is to continue to answer departmental hotlines.

(k) ICC should provide client departments with regular statistics on complaints received on its service.

Personal data privacy

(l) Callers' consent should be obtained when ICC passes their personal data to client departments or third parties.

One-stop service

(m) To make for a one-stop service in practice and in name, the long-term solution is to migrate to a single hotline number, say, the Citizen's Easy Link 1823.

(n) There should be an operator to screen and forward calls to the appropriate ICC specialist team.

Departmental call centres

(o) Departments should be given the option of having their own call centres or joining the ICC scheme.

Management culture

(p) A review should be undertaken to examine and address management-staff issues.

Working relationships

(q) EU and ICC should strengthen mutual understanding and cooperation with client departments.

(r) EU should determine the appropriate service role for ICC, review ICC's management culture and arrange training for management staff.

8. EU accepted most of our recommendations but preferred to continue its practice of answering departmental hotlines in the name of the department until all its clients had agreed to migrate to a single hotline number. It also considered that setting up sepcialised teams would defeat the concept of one-stop service and downgrade the performance of ICC. We consider that an open government should be accountable and transparent. We believe that some degree of specialisation will minimize misdirection or misassignment of cases. We, therefore, maintain our recommendations and will continue to liaise with EU on their implementation.

July 2003

Summaries of Direct Investigations

HOME AFFAIRS DEPARTMENT (HAD)

Assistance provided by HAD to Owners and Owners' Corporations in Managing and Maintaining their Buildings

Background

In March 2003, this Office completed a direct investigation into how HAD facilitated the formation of owners' corporations (OCs). While investigating, this Office noted considerable community concern over the adequacy and effectiveness of the assistance provided by HAD to owners and OCs in managing and maintaining their buildings. The Ombudsman, therefore, decided to conduct another direct investigation focusing on that issue.

Government Policy and Strategy

2. The responsibility for managing and maintaining private property rests with the owners. The role of Government is to encourage them to form OCs and to give advice and assistance. In April 2001, Government published a comprehensive implementation strategy for building safety and timely maintenance, which included measures for encouraging and improving responsible building management. In May 2001, the Secretary for Home Affairs (SHA) set out Government's three-pronged approach to strengthen support to owners and OCs –

(a) to provide a legal framework conducive to the formation and operation of OCs;

(b) to provide more professional advice, more comprehensive and accessible services to owners and OCs; and

(c) to provide training for OC members.

For this, Government allocated additional funds of $43.9 million a year to HAD, including that for 90 posts.

Organisational Set-up and Staff Deployment

3. At the headquarters level, HAD's Building Management Division planned and coordinated building management services; and provided support and training to frontline staff. At the regional level, four Building Management Resource Centres (BMRCs) provided information, answered enquiries, offered advice and organised training courses, workshops

and exhibitions. The Centres also arranged appointments for owners and OC members to seek free expert advice from volunteer professional bodies. At the district level, the District Building Management Liaison Team (DBMLT) in each District Office (DO) helped owners form OCs, provided proactive assistance to owners and OCs of problematic buildings, offered advice at meetings when invited, organised publicity and training programmes, handled complaints and mediated in disputes.

4. HAD's building management services used to be provided by its own Liaison Grade staff, Housing Grade staff seconded from the Housing Department, together with a Senior Building Surveyor (SBS) and a Senior Government Counsel (SGC). DBMLTs were assisted by Temporary Community Organisers (TCOs) performing more labour-intensive duties such as household visits, information dissemination and collection.

5. In March 2003, HAD decided to delete all 78 Housing Grade posts by phases, from 2002 / 03 to 2005 / 06. By October 2003, HAD had deleted 37 posts including the SBS and transferred the SGC post to the Department of Justice. The departure of such staff inevitably diluted the expertise in HAD and affected the quality of its building management services.

Observations and Conclusions

6. From the investigation, this Office had the following main observations and conclusions –

(a) Over the past 30 years, Government had devoted much efforts to promote good building management. In recent years, Government had amended the Building Management Ordinance (BMO) and drawn up proactive strategies and positive policies to further assist owners and OCs. Government's intentions and efforts were commendable.

(b) HAD had also put in commendable efforts to promote and support good building management and to organise more training for owners and OCs. However, the Department still fell short in providing advice and proactive assistance to owners and OCs.

(c) The deletion of all Housing Grade and professional posts for building management services had frustrated SHA's policy objectives declared and resourced in 2001, which was tantamount to turning the clock back to the pre-2000 era.

(d) While HAD had to achieve efficiency savings under Government's economy drive, it must not allow services to slip or deteriorate. To this end, HAD must re-examine its role, re-adjust its priorities and re-deploy its resources.

(e) While HAD should continue to enlist the voluntary services of professional bodies and professionals in private practice, the Department must build up its own building management expertise for service enhancement and legislation reviews.

(f) Despite HAD's continued publicity and education, some owners and OCs were still under the misconception that Government had a duty to solve all their management problems. That had created unnecessary difficulties for and undue burden on HAD.

(g) TCOs in DBMLTs were not trained or meant to advise owners and OCs, but many owners / OCs thought they were.

(h) HAD and other Government departments had produced a wide range of materials relating to building management. Public access to such materials should be enhanced.

(i) HAD had extended the opening hours of BMRC / Kowloon and upgraded the telephone redirection and recording services which operated after opening hours, which was a welcome move.

(j) HAD had, since September 2002, arranged for professional bodies to provide free mediation service at BMRCs on a pilot basis. However, only four mediation sessions had been conducted since.

(k) HAD had in 1985 set up Building Management Coordination Committees (BMCCs) to identify problematic buildings and coordinate inter-departmental efforts in resolving their management and maintenance problems. The scheme, however, had problems of interfacing with the Buildings Department's Coordinated Maintenance of Buildings Scheme (CMBS) established in 2000.

(l) Government policies on building management were found to be fragmented, and responsibilities scattered among a number of bureaux and departments. The situation was complicated by Team Clean asking the Housing, Planning and Lands Bureau, instead of the Home Affairs Bureau, to formulate policy on mandatory formation of OCs and appointment of property management companies.

Recommendations

7. The Ombudsman made the following recommendations to HAD and the Administration –

HAD

Staff deployment

(a) To critically review its staff complement, in particular its deletion of all Housing Grade and professional posts for building management services.

(b) To clarify and publicise the roles of its Liaison Officers and TCOs for realistic perception and reasonable expectations by owners and OCs.

Means of service delivery

(c) To upload building management publications onto or provide hyperlink access through the Department's building management website.

(d) To enhance the information on the website and allow alternative access by themes.

(e) To produce, in collaboration with other departments and professional bodies, more checklists on handling of building management problems for the reference of owners and OCs.

(f) To review the needs of BMRC users on a regular basis and extend or revise the opening hours of BMRCs for client convenience.

(g) To publicise more widely the pilot mediation scheme provided at BMRCs.

(h) To step up training on the legal aspects of BMO for OC members.

(i) To critically review and resolve the interface problems between the HAD's BMCCs and the CMBS administered by the Buildings Department.

Support and control

(j) To expedite the production of staff reference materials and to expand the "Frequently Asked Questions on BMO".

(k) To refine the staff training and development plan.

(l) To consider sponsoring appropriate staff to acquire formal qualifications in housing management.

(m) To devise standard classification of building management themes and sub-themes for consistent reporting of management information.

(n) To consider setting up in DOs a network of Client Liaison Groups to tap user feedback and suggestions.

The Administration

(o) To consider designating one single bureau in Government to coordinate the formulation of policies on private building management.

Final Remarks

8. Overall, HAD accepted all our recommendations.

November 2003

Annex 7
Summaries of Direct Investigations

HONG KONG EXAMINATIONS AND ASSESSMENT AUTHORITY (HKEAA)

Handling of Examination Scripts under Marking

Background

There had been media reports on recurrent loss of examination scripts in the course of marking. Such losses could affect the future of the young people concerned and undermine public confidence in our examinations system. We examined HKEAA's measures for the safe custody of examination scripts and its remedial action in case of loss.

Lost Scripts and Remedial Measures

2. About two million scripts had to be marked every year. In the last five years, 77 scripts were lost. HKEAA's view was that with the collection and transfer of such a large volume of scripts, loss of some was inevitable. In the event of loss, HKEAA would not inform the candidate but would award an assessed mark. HKEAA did not keep any proper report on its investigation process and findings.

3. Markers were not given any specific guidelines or cautionary advice on the safe custody of scripts. Except for those who had admitted negligence, subsequent appointment of markers who had lost scripts would not be affected.

Observations and Opinions

4. We considered the loss of even one script to be one too many. Some might see this as an indictment on HKEAA's dereliction of duty to the candidates and a breach of the public faith in its administration of the examinations system. HKEAA's lack of transparency (i.e. not informing the affected candidates) was out of step with present-day accountable governance. The total absence of proper investigation to ascertain responsibility among those concerned and a penalty system commensurate with the level of responsibility was incredible.

5. It was not satisfactory that HKEAA did not have guidelines to markers on prevention of loss or on due caution. As markers were remunerated for marking, they should not expect to be exonerated because HKEAA had not issued reminders or guidelines.

6. Candidates affected had a right to be informed of the loss of their scripts and to decide on remedy in view of the impact of the loss on their future.

Recent Development

7. At the end of January 2004, HKEAA announced a new arrangement whereby candidates would be given a choice on the day the examination results were announced : accepting the assessed mark or receiving a refund of fees. This was Hobson's choice, not good enough and too little too late.

Recommendations

8. The Ombudsman made the following recommendations to HKEAA –

General

(a) HKEAA and markers to adopt a more responsible and transparent attitude towards loss of scripts.

Follow-up action on loss

Investigation

(b) Maintain a file for each case to record the investigation process, deliberations and any other data.

(c) Properly investigate each and every report of loss, analyse causes for the loss and consider remedial measures.

(d) Arrange for all cases to be discussed at a proper forum of the Authority convened for the purpose of apportioning responsibility, awarding penalties, analysing causes for the loss and determining precautionary measures.

Penalty system

(e) Devise a system of deterrent and penalty for loss of scripts.

Prevention of loss

(f) Include in the instruction guide to markers a firm reminder of the importance of safe custody for scripts and appropriate advice against risk of loss in transit and marking.

(g) Circulate extracts of reports on the investigation of loss among markers to promote and enhance their awareness.

(h) Appeal for school principals' cooperation in providing markers with safe storage for scripts, e.g. in teachers' offices.

(i) Review the invigilation process, especially the collection of scripts from candidates on departure from the examination centre. Strengthen the guidelines for centre supervisors and invigilators.

Marker ethics

(j) Impress upon markers their duty to their classes and candidates.

Remedial measures

(k) Notify candidates affected soonest possible, on availability of assessed score.

(l) Consider offering candidates the option of re-sitting an examination or accepting the assessed marks. On this, it might be useful for HKEAA to consult such interest groups as parent-teacher associations.

(m) Set up proper mechanism for appeal against remedial measures taken.

Comments from HKEAA

9. HKEAA recognised the significance of lost scripts and the need for remedial measures to be fair. However, it was concerned over the technical difficulties and cost-effectiveness of re-examination.

Final Remarks

10. The Ombudsman believed that with HKEAA's established procedures and experience, the technical difficulties associated with re-examination could, and should, be overcome. In considering the cost-effectiveness angle, the interests and rights of the candidates and the public interest in maintaining a fair and credible public examinations and assessment system should not be ignored.

March 2004

Summaries of Direct Investigations

SOCIAL WELFARE DEPARTMENT (SWD)

Prevention of Abuse of Comprehensive Social Security Assistance

Background

The Comprehensive Social Security Assistance (CSSA) scheme provides a safety net for the needy and vulnerable. The community supports assistance for the less fortunate but is concerned over possible abuse of the scheme. SWD has the responsibility to establish the mechanism to deter abuse and to investigate suspected cases.

2. Against this background, The Ombudsman decided to conduct a direct investigation : any system with scope for abuse and malpractice could constitute maladministration.

3. CSSA aims to provide recipients with all the basic necessities and their special needs through the disbursement of standard rates, supplements and various special grants. To be eligible, applicants have to satisfy both a residence requirement and a means test. They have to attest to the accuracy of the information provided in support of their eligibility and to report subsequent changes in financial condition and family status. The Special Investigation Section (SIS) of SWD is responsible for investigating cases of suspected fraud.

4. On SWD encouragement and arrangement, some recipients participate in the Department's Active Employment Assistance (AEA) and Community Work (CW) programmes.

5. Though cases of abuse are relatively few compared to the total number of CSSA recipients, a credible system for investigating attempts to defraud and a demonstrable determination to punish defrauders help to uphold the integrity of the scheme. This would assure the community that the scheme benefits those genuinely in need and that these persons should not be tarnished or stigmatised by the misconduct of those who abuse the CSSA scheme.

Observations and Opinions

6. The Ombudsman made the following observations and opinions –

Grants on offer

(a) The adjustment of standard rates to reflect deflation had lagged behind the fall in wage level of the lower-income group.

(b) Front-line officers did not have a guide on the rental levels in different districts for assessing the reasonableness of claims for rent allowance.

(c) The working guidelines on the processing of discretionary special grants were too vague, resulting in disparity and inconsistency of treatment.

(d) For single parents, non-monetary support would be more meaningful than a monetary supplement.

Eligibility

(e) There was no limit on the number of dependant children in a recipient family.

(f) The new residence requirement (from one to seven years with effect from 1 January 2004) should be widely publicised to help avoid unrealistic expectations from one-way permit applicants. Discretion to relax this new requirement should be exercised sparingly.

(g) SWD's tolerance of abuse could unwittingly condone fraudulent exploitation of the CSSA scheme.

(h) There might be scope to raise the level of disregarded income or to allow CSSA recipients to accumulate income, provided the asset limit was not exceeded.

(i) The basis to allow applicants to keep the current level of assets was obscure. The non-inclusion of self-occupied property as assets in most cases was a possible loophole for abuse. Non-disclosure of property outside Hong Kong was another area of abuse for being difficult to detect.

(j) Dissemination of information gleaned from SIS investigations could alert staff to common features of potential abuse and usual tactics for concealing information.

(k) Case studies revealed serious delays in the investigation process.

(l) SWD did not readily resort to criminal sanction against fraud and deception.

Recommendations

7. The Ombudsman made the following recommendations –

General

(a) Design publicity programmes targeting specific groups –

i) to promote a positive perception of the scheme;

ii) to remind CSSA applicants and recipients of their obligation to provide full and truthful information; and

iii) to appeal for information on suspected abuse.

Grants on offer

(b) To review regularly all the different components of the grants so that they remained proportional to the household expenditure of the relevant income sector.

(c) To subsume the standard special grants into the standard grant.

(d) To draw up indices on rental levels in districts to assist case officers to determine the rent allowance and detect unreasonable claims.

(e) To set up a committee to review discretionary special grants approved, standardise the more common or frequent applications and draw up guidelines for approving officers.

(f) To review and standardise follow-up action on repeated claims for discretionary special grants, take a firmer stand where recipients should have assumed certain personal responsibility for his predicament.

(g) To consider alternative support in lieu of the single parent supplement.

Eligibility

(h) To review the limit on the number of eligible family members with a view to lowering the amount of standard rate for additional family members.

(i) To publicise the new seven-year residence requirement to intending immigrants.

(j) To consider the practical implications of the seven-year residence requirement.

(k) To keep in view the provision of family services to new arrivals.

(l) To draw up detailed guidelines on the waiving of the seven-year residence requirement.

(m) To review the level of disregarded income and the arrangements for recipients to accumulate income towards the prescribed asset limit.

(n) To consider lowering the prescribed asset limits for initial entry into the CSSA scheme.

Summaries of Direct Investigations

(o) To review the self-occupied property rule and consider limiting the value of such property to be commensurate with the standard of living of most recipients.

(p) To review the procedures and mechanism for monitoring disclosure of property ownership and transfer of assets outside Hong Kong.

Support for self-reliance

(q) To evaluate regularly the effectiveness of the AEA programme.

(r) To strengthen liaison with Government departments and non-governmental organisations and explore more openings for community services.

(s) To review the participation of able-bodied recipients and single parents in the CW programme.

(t) To continue to explore ways to help victims of recent redundancies, including partnering closely with Labour Department on employment placement.

Mechanism for preventing abuse

(u) To provide more training on fraud detection.

(v) To circulate to frontline staff regular reports on cases handled by SIS.

(w) To ensure CSSA applicants were made aware of their obligation to provide accurate and full facts.

(x) To issue guidelines on valuing properties and consider the imposition of penalty where disclosure of ownership was not voluntary.

(y) To strengthen the review procedures on entitlement and continuing eligibility.

(z) To remind staff to refer suspected fraud to SIS without delay.

(aa) To prescribe a performance pledge for complaint handling by SIS and devise a mechanism to check compliance.

(bb) To take a firm stand on attempts to defraud : step up prosecution action, review the need to impose administrative sanctions, devise a high-level mechanism to review action taken.

December 2003